

**Formed Fiber Technologies, Inc.  
Androscoggin County  
Auburn, Maine  
A-678-71-G-A**

**Departmental  
Findings of Fact and Order  
Air Emission License  
Amendment #4**

After review of the air emissions license minor revision application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

**I. REGISTRATION**

**A. Introduction**

1. Gates Formed-Fibre Products, Inc. of Auburn, Maine was issued Air Emission License A-678-71-A-N on August 20, 2001, permitting the operation of emission sources associated with their non-woven fiber products facility. The license was subsequently amended on November 26, 2001 (A-678-71-B-M) January 3, 2002 (A-678-71-C-A) and again on January 8, 2003 (A-678-71-E-A) and transferred to Formed Fiber Technologies, Inc. (FFT) on October 1, 2003 (A-678-71-F-T).
2. FFT will be shutting down the part of the Auburn facility that is currently producing polyester fiber. Facility wide natural gas use is not being changed.

**B. Emission Equipment**

FFT has the following equipment changes:

**Process Equipment**

<u><b>Equipment</b></u>	<u><b>Production Rate</b></u>	<u><b>Pollution Control Equipment</b></u>
<b>Crystallizer #1</b>	<b>900 lb/hr PET</b>	<b>cyclone-baghouse</b>
<b>Crystallizer #2</b>	<b>900 lb/hr PET</b>	<b>cyclone-baghouse</b>
<b>Crystallizer #3</b>	<b>900 lb/hr PET</b>	<b>cyclone-baghouse</b>
Baler #1	6,000 lb/hr fiber	screen filter
Baler #2	6,000 lb/hr fiber	screen filter

**Bold** depicts removed equipment.

**Fuel Burning Equipment**

<b><u>Equipment</u></b>	<b><u>Maximum Capacity (MMBtu/hr)</u></b>	<b><u>Maximum Firing Rate (scf/hr)</u></b>	<b><u>Fuel Type, % sulfur</u></b>	<b><u>Stack #</u></b>
Space Heater #1	4.0	3810	natural gas, neg.	5
Space Heater #2	4.0	3810	natural gas, neg.	6
Space Heater #3	3.24	3090	natural gas, neg.	7
Molding Line K-2	4.0	3810	natural gas, neg.	2
Molding Line K-4	4.0	3810	natural gas, neg.	3
Oven Non-woven Line #1	3.0	2860	natural gas, neg.	1
Oven Non-woven Line #2	3.0	2860	natural gas, neg.	1
Oven Non-woven Line #3	2.0	1905	natural gas, neg.	1
Oven Non-woven Line #7	2.0	1905	natural gas, neg.	1
Molding Line #7	1.0	953	natural gas, neg.	4
<b>Cleaning Oven #1</b>	<b>1.50</b>	<b>1430</b>	<b>natural gas, neg.</b>	<b>N/a</b>
<b>Cleaning Oven #2</b>	<b>1.50</b>	<b>1430</b>	<b>natural gas, neg.</b>	<b>N/a</b>
<b>Process Steam Boiler</b>	<b>6.3</b>	<b>6000</b>	<b>natural gas, neg.</b>	<b>N/a</b>
<b>Hot Oil Heater</b>	<b>1.36</b>	<b>1300</b>	<b>natural gas, neg.</b>	<b>N/a</b>
<b>Oven #1</b>	<b>4.0</b>	<b>3810</b>	<b>natural gas, neg.</b>	<b>N/a</b>

**Bold** depicts removed equipment.

C. Application Classification

This amendment is to remove equipment and total facility emissions will not change. As such, the application is being processed as a minor revision.

**II. AMBIENT AIR QUALITY ANALYSIS**

According to the Maine Regulations Chapter 115, the level of air quality analyses required for a minor source shall be determined on a case-by case basis. Based on the information available in the file, FFT is below the levels required for modeling.

**ORDER**

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-678-71-G-A, subject to the conditions found in transfer A-678-71-F-T. For clarity, Conditions 1 through 36 of license A-678-71-A-N and subsequent amendments have been replaced with the following:

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions (Title 38 MRSA §347-C).
- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 115. [MEDEP Chapter 115]
- (3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both. [MEDEP Chapter 115]
- (4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request. [MEDEP Chapter 115]
- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S.A. §353. [MEDEP Chapter 115]
- (6) The license does not convey any property rights of any sort, or any exclusive privilege. [MEDEP Chapter 115]
- (7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [MEDEP Chapter 115]
- (8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records

- for a minimum of six (6) years. The records shall be submitted to the Department upon written request. [MEDEP Chapter 115]
- (9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license. [MEDEP Chapter 115]
- (10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license. [MEDEP Chapter 115]
- (11) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:
- A. perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:
    - 1. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
    - 2. pursuant to any other requirement of this license to perform stack testing.
  - B. install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
  - C. submit a written report to the Department within thirty (30) days from date of test completion.
- [MEDEP Chapter 115]
- (12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:
- A. within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and
  - B. the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to

the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and

- C. the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

[MEDEP Chapter 115]

- (13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [MEDEP Chapter 115]

- (14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emission and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation. [MEDEP Chapter 115]

- (15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [MEDEP Chapter 115]

- (16) **Space Heater #1 and #2**

- A. Emissions from Space Heater #1 and Space Heater #2 each shall not exceed the following [MEDEP Chapter 115, BPT]:

	lb/MMBtu	lb/hr
PM	0.01	0.03
PM <sub>10</sub>	n/a	0.03
SO <sub>2</sub>	n/a	0.01
NO <sub>x</sub>	n/a	0.39
CO	n/a	0.32
VOC	n/a	0.03

- B. Visible emissions shall not exceed 10% opacity on a (6) six-minute block average basis, except for no more than one (1) six (6) minute block average in a 3-hour period. [MEDEP Chapter 101]

(17) **Space Heater #3**

- A. Emissions from Space Heater #3 shall not exceed the following [MEDEP Chapter 115, BPT]:

	lb/MMBtu	lb/hr
PM	0.01	0.03
PM <sub>10</sub>	n/a	0.03
SO <sub>2</sub>	n/a	0.01
NO <sub>x</sub>	n/a	0.31
CO	n/a	0.26
VOC	n/a	0.02

- B. Visible emissions shall not exceed 10% opacity on a (6) six-minute block average basis, except for no more than one (1) six (6) minute block average in a 3-hour period. [MEDEP Chapter 101]

(18) **Fiberbed System** [MEDEP Chapter 115, BPT]

- A. The fiberbed system shall be limited to the following emission rates:

<u>Pollutant</u>	<u>lb/hr</u>
PM	5.77
PM <sub>10</sub>	5.77
SO <sub>2</sub>	0.07
NO <sub>x</sub>	2.62
CO	2.16
VOC	8.16

Compliance is based on stack testing. Additional testing shall be performed when requested by the Department.

PM testing shall be performed in accordance with EPA Methods 5 and 202.

VOC testing shall be performed in accordance with EPA Method 25A modified by using chilled impingers like those used in Method 202 or other method approved by the Department to remove condensable PM. Methane shall be quantified using EPA Method 18 or other method approved by the Department. The quantified methane shall be subtracted from the Method 25A result.

- B. Visible emissions shall not exceed 10% opacity on a (6) six-minute block average basis, except for no more than one (1) six (6) minute block average in a 3-hour period. [MEDEP Chapter 101]
- (19) FFT shall operate the thermo-bonding ovens only at times when the wet fiberbed scrubber is in operation. [MEDEP Chapter 115, BPT]
- (20) Facility-wide fuel use shall not exceed 536 MMscf/yr of natural gas based on a 12-month rolling total. Fuel use records shall be maintained on a monthly basis, in addition to the 12-month rolling total. [MEDEP Chapter 115, BPT]
- (21) FFT is limited to an operational limit of 50 million pounds of thermobonder output per year, based on a 12-month rolling total, demonstrated by production records. [MEDEP Chapter 115, BPT]
- (22) FFT, if required to do so by the Department, shall conduct stack emission testing, and demonstrate compliance with the applicable standard, on any source within 60 days after receipt of notice from the Bureau of Air Quality. [MEDEP Chapter 115, BPT]
- (23) FFT shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any air emission standard. [MEDEP Chapter 115, BPT]
- (24) **Annual Emission Statement** [MEDEP Chapter 137]  
In accordance with MEDEP Chapter 137, the licensee shall annually report by September 1, to the Department, the information necessary to accurately update the State's emission inventory by means of:
- 1) A computer program and accompanying instructions supplied by the Department;
  - or
  - 2) A written emission statement containing the information required in MEDEP Chapter 137.
- Reports and questions should be directed to:
- Attn: Criteria Emission Inventory Coordinator  
Maine DEP  
Bureau of Air Quality  
17 State House Station  
Augusta, ME 04333-0017  
Phone: (207) 287-2437

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- (25) FFT shall pay the annual air emission license fee within 30 days of **August 30th** of each year. Pursuant to 38 MRSA §353-A, failure to pay this annual fee in the stated timeframe is sufficient grounds for revocation of the license under 38 MRSA §341-D, subsection 3. [38 MRSA §353-A]

DONE AND DATED IN AUGUSTA, MAINE THIS \_\_\_\_\_ DAY OF \_\_\_\_\_, 2004.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: \_\_\_\_\_  
DAWN R. GALLAGHER, COMMISSIONER

**The term of this amendment shall be concurrent with the term of Air Emission License A-678-71-A-N.**

PLEASE NOTE THE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: January 20, 2004

Date of application acceptance: January 30, 2004

Date filed with the Board of Environmental Protection: \_\_\_\_\_

This Order prepared by Mark Roberts, Bureau of Air Quality.